



EX PARTE OR LATE FILED

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August 23, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Room TWB-204  
Washington, DC 20554

**ORIGINAL**

**RECEIVED**

**AUG 23 2004**

Federal Communications Commission  
Office of Secretary

**Re: Notice of Ex Parte Communication**

Implementation of the Pay Telephone Reclassification and Compensation  
Provisions of the Telecommunications Act of 1996  
CC Docket No. 96-128

Dear Ms. Dortch:

On August 20, 2004, I spoke by telephone with Jessica Rosenworcel, Legal Advisor to Commissioner Copps, about Sprint's petition for reconsideration, pending in this docket. The petition asks that a corporate officer be allowed to certify payphone compensation data, rather than limiting that role solely to a carrier's chief financial officer.

I explained that, for a smaller carrier, a CFO might be appropriate to certify payphone compensation data. At a large carrier, particularly one like Sprint that has only a single CFO for its entire corporate organization, it makes no sense to limit this role to the CFO. A CFO is already heavily burdened with existing duties and is far removed from routine payphone issues. Allowing any officer to certify would provide the very same protections, while lifting a needless burden from the CFO and removing a significant administrative headache from the carrier.

Pursuant to the requirements of Section 1.1206 of the Commission's rules, Sprint is filing an electronic copy of this notice for addition to the docket.

Respectfully submitted,

John E. Benedict

cc: Scott Bergmann  
Matthew Brill  
Daniel Gonzalez  
Christopher Libertelli  
Jessica Rosenworcel  
Jeffrey Carlisle  
Denise Coca  
Tony Dale  
William Dever  
Darryl Cooper